

MEMO ENDORSED

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March 15, 2022

By ECF

Hon. Valerie E. Caproni
United States District Court Judge
40 Foley Square
New York, New York 10007

Re: United States v. Avila, et al. (Tyler Patterson)
Ind. #: (S3) 19 Cr. 166 (VEC)

Dear Judge Caproni:

I represent Tyler Patterson in this matter. I write pursuant to your Honor's individual rules to request permission to file my sentencing submission with redactions of Administration for Child Services records regarding my client and his family which contain information about official investigations of abuse and neglect in the household, and statements to officials made in confidence to the agency about their personal knowledge of such matters. In addition, I seek to file excerpts of the actual ACS case records under seal when annexed to the submission as exhibits, and to redact from my sentencing letter itself references and quotations from the ACS record when they appear in the text. By AUSA Jamie Bagliebter, the government has no objection to such redactions, and I therefore respectfully request that this application be granted in its entirety.

Thank you very much for your attention to this matter.

Respectfully,

Robert A. Soloway

Robert A. Soloway

cc: All Counsel (by ECF)
RAS:sc

Application GRANTED. Defense counsel must submit unredacted copies to the Court via email, which the Court will file under seal.
SO ORDERED.

Valerie Caproni
3/16/22

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE